BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

In the Matter of)	DOCKET NO	. 2008	-0273	
PUBLIC UTILITIES COMMISSION)				
Instituting a Proceeding to Investigate the Implementation of Feed-in Tariffs.))) _)		PUBLIC UT	2009 JAN 28	FIL
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THE DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM'S INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC. ("HECO") AND THE CONSUMER ADVOCATE ("CA") REGARDING THE "JOINT PROPOSAL ON FEED-IN TARIFFS OF THE HECO COMPANIES AND CONSUMER ADVOCATE"

AND

CERTIFICATE OF SERVICE

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The Department of Business, Economic Development, and

Tourism ("Department" or "DBEDT"), by and through its Director

("Director") in his capacity as the Energy Resources

Coordinator, and through the undersigned Deputy Attorney

General, hereby submits to the Hawaii Public Utilities

Commission ("Commission") its information requests to HECO and

the CA regarding the "Joint Proposal on Feed-In Tariffs of the

HECO Companies and Consumer Advocate" filed with the Commission

on December 23, 2008. Part I provides DBEDT's information

requests to HECO, and Part II provides DBEDT's information

requests to the CA.

Part I: Information Requests to HECO

DBEDT-IR-1 (HECO)

- a) Please state and explain the goals and/or objectives of the HECO and CA's joint proposal on feed-in tariffs, and explain how each goal or objective will be achieved by the proposal.
- b) Please explain how the joint proposal will help achieve the HCEI goal of promoting and increasing the use and development of renewable energy resources to supply 70% of Hawaii's energy needs by 2030, which the Energy Agreement between the State and the HECO companies ("Energy Agreement") purports to support.

DBEDT-IR-2 (HECO)

Please specify how much renewable energy resources the HECO companies plan to purchase through the feed-in tariffs, and by when.

DBEDT-IR-3 (HECO) - Reference: Joint Proposal, Page 5

- a) Please specify the types and sizes of renewable resources targeted by the joint proposal that would satisfy the four criteria specified in the referenced page of the proposal.
- b) Please specify what exactly is meant by "lengthy interconnection studies" as used in criterion #2, and whether or not these "lengthy interconnection studies" are or will be factored into the timeline for the contracting process or procedure for the FITs.
- c) Please specify what exactly is meant by "significant interconnection requirements" and whether or not they are above and beyond what is normally required for interconnecting current and future net energy metered customers.
- d) Is it HECO's position that PV and CSP systems that are 500 kW or less in size, as well as in-line hydropower and wind power systems that are 100 kW or less in size, do not require "lengthy interconnection studies" and "significant interconnection requirements"?

DBEDT-IR-4 (HECO)

- a) Based on the types and sizes targeted by the proposal, is it correct that HECO plans or envisions its FITs proposal to apply only to net energy metered customers and small distributed generation? If yes, please explain why and how this will promote the increased use and development of renewable resources in HECO's generation portfolio as agreed to by the parties in the Energy Agreement.
- b) Please explain how the FITs proposal will be applied to net energy metered customers, including a comparison of its impact on such customers under your proposal and under the current net energy metering statute set forth in Section 269-102, Hawaii Revised Statutes.
- c) Please explain how the FITs proposal will benefit existing net energy metered customers.
- d) Please explain how the FITs proposal will encourage and increase net energy metered customers.

DBEDT-IR-5 (HECO)

Will HECO's FIT proposal apply to the purchase of utility scale renewable resources? If it will not, why not?

DBEDT-IR-6 (HECO)

Please explain how HECO envisions using the FITs to procure the renewable generation that the HECO companies committed to pursue and integrate into the system under the Energy Agreement, which total 1,612.4 MW by 2030 (HECO = 1308, HELCO = 147.5, MECO = 156.9).

DBEDT-IR-7 (HECO)

- a) Please specify how much of the total renewable resource commitments under the Energy Agreement summarized HECO plans to purchase through the FITs proposal.
- b) How does HECO plan to procure those renewable resources commitments that will not be procured through FITs?

DBEDT-IR-8 (HECO) Reference: HECO/CA Joint Proposal, Page 8.

What does HECO mean by "The FIT Proposal is intended as an interim starting point..."? How long will this "interim" FIT proposal be in effect? When does HECO plan to design and file a final FIT proposal?

DBEDT-IR-9 (HECO) Reference: HECO/CA Joint Proposal, Page 9.

- a) What is the status of the Net Energy Metering Pilot Program ordered by the Commission in Docket No. 2006-0084?
- b) Will HECO's FIT proposal apply to the Net Energy Metering Pilot Program? If yes, please explain what and how it will impact the Program.

PART II: Information Requests to the CA

DBEDT-IR-1 (CA)

Please identify which section of the joint proposal was prepared by the CA, and which section was prepared by HECO.

DBEDT-IR-2 (CA)

Please explain the process through which HECO and the CA collaborated to develop the joint proposal.

DBEDT-IR-3 (CA)

Was there complete consensus or agreement between HECO and the CA on all sections of the joint proposal? If not, please identify those sections where the CA and HECO did not have complete consensus.

DBEDT-IR-4 (CA)

Please explain what the CA believes to be the role of the joint FIT proposal in HECO's procurement of renewable energy resources that are committed in the Energy Agreement.

DBEDT-IR-5 (CA)

Does the CA believe that the joint FIT proposal will benefit existing net energy metered customers? If yes, please explain how.

DATED: Honolulu, Hawaii, January 28, 2009.

REGGIJ. KINKLEY

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Certificate of Service

I hereby certify that I have served a copy of INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC. AND THE CONSUMER ADVOCATE REGARDING THE "JOINT PROPOSAL ON FEED-IN TARIFFS OF THE HECO COMPANIES AND CONSUMER ADVOCATE", by the Department of Business, Economic Development, and Tourism in PUC Docket Number 2008-0273, by electronic transmission on the date of signature to each of the parties listed below.

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